

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

CHRISTINA McCALL (CABN 234139)
Assistant United States Attorney

1301 Clay Street, Suite 340-S
Oakland, California 94612
Telephone: (510) 637-3680
Facsimile: (510) 637-3724
E-Mail: christina.mccall@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-11-0905 SBA
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER TO CONTINUE STATUS
v.)	HEARING TO MARCH 21, 2014
)	
JORDAN MOORE and)	Date: February 14, 2014
SYLVESTER MOORE,)	Time: 9:30 a.m.
)	Court: Hon. Kandis A. Westmore
Defendant.)	

The above-captioned matter is set on February 14, 2014 before this Court for a status or change-of-plea hearing. The parties request that this Court vacate that date and set this matter for status or change-of-plea hearing on March 21, 2014 at 9:30 a.m and that the Court exclude time under the Speedy Trial Act between the date of this stipulation and March 21, 2014. The parties stipulate that the time is excludable from the time limitations of the Speedy Trial Act because the interests of justice are served by granting a continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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STIP. REQ. TO CONTINUE SENTENCING HEARING
NO. CR-11-0905 SBA

This continuance will allow the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence. Counsel for Sylvester Moore has two approximately two-week trials set between now and March 21. Counsel for the government has prepared a Superseding Information incorporating the out-of-district robberies for a global resolution, has drafted plea agreements addressing all the robberies, and needs to obtain written permission from the District of Iowa, San Joaquin County, and Santa Clara County for a global resolution in this Court. The defense attorneys continue to review evidence of robberies in several different jurisdictions to advise their clients about a global resolution.

As such, the parties respectfully request that the time between the date of this stipulation and March 21, 2014 be excluded under U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: February 13, 2014

Respectfully submitted,


MELINDA HAAG United States Attorney <u>/s/ Christina McCall</u> CHRISTINA McCALL Assistant U. S. Attorney	 <u>/s/ Garrick S. Lew</u> GARRICK S. LEW Attorney for Jordan Moore	 <u>/s/ Paul Demeester</u> PAUL DEMEESTER Attorney for Sylvester Moore
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ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of justice, pursuant to 18 U.S.C. sections 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued until March 21, 2014 at 9:30 a.m., and time is excluded until March 21, 2014.

IT SO ORDERED.

DATED: 2/13/14


The Hon. Kandis A. Westmore
United States Magistrate Court Judge